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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE 1,

Plaintiff,

v.

Civil Action No. 25-CV-2113 (JMF)

ALON ALEXANDER, OREN  
ALEXANDER, and TAL ALEXANDER,

Defendants.

PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF THE MOTION TO  
PROCEED ANONYMOUSLY PURSUANT TO FRCP RULE 10(a)

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**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF THE MOTION TO  
PROCEED ANONYMOUSLY PURSUANT TO FRCP RULE 10(a)**

Plaintiff Jane Doe 1 ("Plaintiff"), by and through her undersigned counsel, Gruenberg Kelly Della, respectfully submits this Memorandum of Law in support of her Motion to Proceed Anonymously pursuant to Federal Rule of Civil Procedure ("FRCP") Rule 10(a) (the "Motion") in the action she has brought against Alon Alexander ("Alon"), Oren Alexander ("Oren"), and Tal Alexander ("Tal") (collectively, "Defendants" or the "Alexander Brothers"). A proposed order is attached to the Declaration of Michael DellaUniversita ("Della Decl.") as Exhibit A.

**PRELIMINARY STATEMENT**

Plaintiff is a survivor of rape who seeks to proceed under a pseudonym in this litigation to safeguard her mental health, physical safety, and overall well-being. In support of this request, a notarized Affidavit from Plaintiff is attached hereto as Exhibit B.<sup>1</sup> Defendants, who are public figures facing multiple allegations of sexual abuse in both civil and criminal proceedings, will suffer no prejudice by Plaintiff proceeding under a pseudonym. While Plaintiff has not yet disclosed her identity to Defendants, she is willing to do so upon execution of a narrowly tailored confidentiality agreement—requiring that Defendants and their counsel keep her identity strictly confidential. To date, Defendants have not signed such an agreement. Plaintiff's efforts to protect her identity, including her willingness to disclose it under specific safeguards, underscore the legitimacy of her request for anonymity and the genuine fear and risk she faces if forced to proceed publicly. Pursuant to the factors in Sealed Plaintiff v. Sealed Defendant, 537 F.3d 185 (2d Cir. 2008), Plaintiff requests that she be permitted to proceed anonymously pursuant to FRCP 10(a).

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<sup>1</sup> Plaintiff's notarized Affidavit, originally submitted in support of her request to proceed under a pseudonym in the New York State Supreme court, is attached hereto as Exhibit B, with Exhibits omitted.

## FACTUAL BACKGROUND

As detailed in Plaintiff's Complaint, attached hereto as Exhibit C, in 2016, when Plaintiff was just 20 years old, she responded to an Instagram story posted by Chantel Jeffries—a high-profile celebrity Disc Jockey with millions of followers—soliciting a companion to go on a date in New York City. Plaintiff's friend also responded to the Instagram story by Chantel Jeffries and ultimately connected with Defendant Alon Alexander and told him that she wanted to set Plaintiff up with a family-oriented man interested in a long-term relationship. Alon, following a deliberate and practiced pattern of predation, messaged Plaintiff directly with the information he obtained from Plaintiff's friend, and after conversing, invited her to meet in Manhattan, New York, for dinner. Unaware of his true intentions, Plaintiff drove into the city to meet Alon at the location he provided. When she arrived, however, she realized there was no restaurant—just the first of many intentional deceptions. Alon told her he was at a nearby bar and invited her to join. Plaintiff explained that she was only twenty years old and unable to enter a bar legally. Alon then suggested she meet him at his apartment in Soho, assuring her they would head to dinner afterwards. See Exhibit C, ¶¶ 12-19.

Once Plaintiff entered Alon's apartment, Alon immediately handed her an already prepared drink—an act that would become a defining feature of Defendants' coordinated pattern of sexual assault.<sup>2</sup> After consuming part of the drink, Plaintiff began to experience intense disorientation and

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<sup>2</sup> Press Release, U.S. Attorney's Office, Southern District of New York, Alon Alexander, Oren Alexander, And Tal Alexander Charged In Manhattan Federal Court With Sex Trafficking Offenses (Dec. 11, 2024), <https://www.justice.gov/usao-sdny/pr/alon-alexander-oren-alexander-and-tal-alexander-charged-manhattan-federal-court-sex>; Debra Kamin, *These Brothers Were Real Estate Hotshots, And Predators, Some Women Say*, N.Y. TIMES (July 26, 2024), <https://www.nytimes.com/2024/07/24/realestate/tal-oren-alexander-sexual-assault.html>; Brooklee Han, *Real estate broker Oren Alexander and brother accused of rape in New York*, HOUSINGWIRE (June 10, 2024, 5:21 PM), <https://www.housingwire.com/articles/real-estate-broker-oren-alexander-and-brother-accused-of-rape-in-new-york/>; Exhibit A - Docket and Summons & Complaint from Originating Court, *Parker v. Alexander et al.*, 1:24-cv-04813-LAK (S.D.N.Y. June 25, 2024), ECF 1-1; Superseding Indictment at 5, *U.S. v. Alexander et al.*, 1:24-cr-00676-UA (S.D.N.Y. Dec. 11, 2024), ECF 3; Id. at 3; Id. at 2; Id. at 2-3; Alice Gainer, *Alexander brothers will face more charges as 60 women allege rape, prosecutors say*, CBS NEWS (Feb. 7, 2025, 8:22 PM),

1 impairment far beyond what she would expect from alcohol alone. Thereafter, Alon offered to show  
2 her around the apartment. During this time, Alon brought Plaintiff into a bedroom where his  
3 brother, Defendant Tal Alexander, was in bed with another woman. When Plaintiff approached to  
4 politely introduce herself, Tal turned his head and forcibly kissed her on the lips. This was no  
5 accident—it was part of a deliberate strategy to test her boundaries and further disorient her.

6  
7 See Exhibit C, ¶¶ 19-22.

8 Alon and Plaintiff eventually returned to a sofa near the entrance, where they began to  
9 converse. Then, following his disturbing pattern, Alon began kissing and touching Plaintiff.  
10 Plaintiff clearly told him to stop, explaining that she had recently undergone breast surgery and that  
11 touching her was painful. She physically removed his hands, voiced her discomfort, and made it  
12 clear that she did not want to engage in sexual activity. Despite her repeated refusals and physical  
13 resistance, Alon coerced her into a bedroom. Plaintiff cannot recall how she ended up on the bed—  
14 her memory clouded by the effects of the drink. Once there, Alon told her that if he couldn't touch  
15 her, she would have to perform oral sex. He then grabbed her head, forced it toward his penis, and  
16 held her there controlling her movements and ignoring her clear refusals. See Exhibit C, ¶¶ 23-29.

17  
18 While Plaintiff was being forced to perform oral sex on Alon, Defendant Oren Alexander  
19 entered the room. Without saying a word, Oren began undressing her from behind and vaginally  
20 raped her. Alon and Oren then switched positions and continued the horrific sexually violent  
21 assault. Throughout the attack, Plaintiff remained in an impaired, disoriented state, likely due to an  
22 intoxicant Alon had given her. During the horrific sexual assault, Plaintiff felt paralyzed—trapped  
23 between the brothers, disassociated from the moment, and powerless to physically resist. And Tal's  
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<https://www.cbsnews.com/newyork/news/alexander-brothers-will-face-more-charges/>; Chloe Atkins, *Women detail*  
28 *alleged assaults by real estate star Oren Alexander and his brother*, NBC NEWS (Feb. 6, 2025, 7:23 PM),  
<https://www.nbcnews.com/news/us-news/women-detail-alleged-assaults-real-estate-star-oren-alexander-brother-rcna191110>.

1 presence in the apartment, and his initial assault, was not incidental. It was part of a coordinated  
2 and deliberate effort by the Alexander Brothers to create an atmosphere of normalized sexual  
3 aggression and silence. Each brother played a role in executing this horrific assault—using their  
4 combined wealth, status, and social media clout to lure, isolate, and violate vulnerable young  
5 women. See Exhibit C, ¶¶ 28-39.

7 Sadly, this was not an isolated incident—it was a methodical system of exploitation. The  
8 Alexander Brothers operated from a position of immense power: multimillionaire real estate  
9 moguls with public personas built on charm, success, and influence. They used that power to disarm  
10 their victims, control the narrative, and shield themselves from accountability. But behind the  
11 polished veneer of luxury and celebrity, they orchestrated a brutal campaign of predation and sexual  
12 violence. This lawsuit seeks to pierce that carefully constructed facade and hold the Defendants  
13 accountable for the calculated, coordinated, and devastating harm they inflicted on Plaintiff and  
14 many others. See Exhibit C, ¶¶ 1-4, 41-56.

## 16 ARGUMENT

### 18 I. APPLICABLE STANDARDS

19 While Federal Rule of Civil Procedure 10(a) requires that “[t]he title of [a] complaint must  
20 name all the parties,” courts have consistently recognized that this requirement is not absolute. The  
21 rule is intended to promote transparency and public scrutiny of judicial proceedings. Doe v. Blue  
22 Cross & Blue Shield United, 112 F.3d 869, 872 (7th Cir. 1997). However, in cases involving highly  
23 sensitive and personal matters—particularly those involving sexual violence—federal courts have  
24 routinely permitted plaintiffs to proceed anonymously to protect their privacy, safety, and  
25 psychological well-being. See, e.g., Does I thru XXIII v. Advanced Textile Corp., 214 F.3d 1058,  
26 1067–68 (9th Cir. 2000) (allowing pseudonyms where disclosure may lead to “harassment, injury,  
27 ridicule or personal embarrassment”) (citing United States v. Doe, 655 F.2d 920, 922 n.1 (9th Cir.

1981)); Doe v. Blue Cross & Blue Shield United of Wis., 112 F.3d 869, 872 (7th Cir. 1997); Doe v. Stegall, 653 F.2d 180 (5th Cir. 1981); Doe v. Evans, 202 F.R.D. 173, 176 (E.D. Pa. 2001) (recognizing public interest in protecting identities of sexual assault victims to encourage others to come forward); Doe v. New York Univ., 537 F. Supp. 3d 483, 496–97 (S.D.N.Y. 2021); Doe v. United Serv. Life Ins. Co., 123 F.R.D. 437 (S.D.N.Y. 1988); Doe v Combs, 2024 U.S. Dist. LEXIS 213256 (S.D.N.Y. 2024), attached hereto as Exhibit D; E.W. v. N.Y. Blood Ctr., 213 F.R.D. 108, 110 (E.D.N.Y. 2003); Roe v. Borup, 500 F. Supp. 127 (E.D. Wis. 1980).

Our courts have long held that a plaintiff may proceed under a pseudonym where their interest in anonymity outweighs the public's interest in disclosure and any potential prejudice to the defendant. Sealed Plaintiff, 537 at 189-90 (A district court has discretion to grant an exception to the “general requirement of disclosure of the names of parties” to permit a plaintiff to proceed under a pseudonym). In balancing these interests, courts consider several factors, including the following “non-exhaustive” list:

1. Whether the litigation involves matters that are highly sensitive and of a personal nature.
2. Whether identification poses a risk of retaliatory physical or mental harm to the party seeking to proceed anonymously or even more critically, to innocent non-parties.
3. Whether identification presents other harms and the likely severity of those harms, including whether the injury litigated against would be incurred as a result of the disclosure of the plaintiff's identity.
4. Whether the plaintiff is particularly vulnerable to the possible harms of disclosure.
5. Whether the suit is challenging the actions of the government or that of private parties.
6. Whether the defendant is prejudiced by allowing the plaintiff to press his claims anonymously, whether the nature of that prejudice (if any) differs at any particular stage of the litigation, and whether any prejudice can be mitigated by the district court.
7. Whether the plaintiff's identity has thus far been kept confidential.



8. Whether the public's interest in the litigation is furthered by requiring the plaintiff to disclose his/her identity.
9. Whether, because of the purely legal nature of the issues presented or otherwise, there is an atypically weak public interest in knowing the litigants' identities.
10. Whether there are any alternative mechanisms for protecting the confidentiality of the plaintiff.

Id. (internal quotation marks, citations, and alterations omitted).

A district court is not required to recite every factor or follow a rigid framework, so long as the record reflects that it thoughtfully balanced the relevant interests, a decision that is reviewed for abuse of discretion. See Sealed Plaintiff, 537 F.3d at 191 n. 4. Here, a proper balancing of the applicable factors weighs strongly in favor of granting Plaintiff's request to proceed under a pseudonym, and Plaintiff respectfully requests that the Motion be granted.

## **II. PLAINTIFF'S REQUEST TO PROCEED ANONYMOUSLY SHOULD BE GRANTED.**

The relevant factors overwhelmingly support Plaintiff's request to proceed under a pseudonym in this matter. Plaintiff was vaginally and orally raped by Defendants Alon and Oren Alexander after an intoxicant – that was surreptitiously give to her by Alon – rendered her incapacitated and unable to consent. Defendant Tal Alexander was also present in the apartment and played a role in the orchestrated assault by initiating unwanted sexual contact with Plaintiff, thereby normalizing the Defendants' coordinated predatory behavior. All three Defendants are prominent, high-profile real estate brokers with significant public visibility, wealth, and influence. Despite their significant public visibility, wealth, and influence, on December 11, 2024, the Alexander Brothers were arrested and are currently facing federal sex trafficking charges brought by the U.S. Attorney's Office for the Southern District of New York, which identified "dozens of victims" in connection with the case. See Exhibit C. In light of the highly sensitive and deeply personal nature of the allegations, the substantial risk of re-traumatization, and the intense media scrutiny surrounding the case, the balance of interests weighs heavily in favor of granting Plaintiff's

1 motion to proceed anonymously. Id.; see also Exhibit B. As the court recognized in Doe v. New  
 2 York Univ., federal courts have discretion to allow pseudonymous litigation where disclosure of a  
 3 plaintiff's identity would expose them to retaliatory harm, emotional distress, or reputational  
 4 damage. 537 F. Supp. 3d at 496–97. Those concerns are acutely present here.

5  
 6 **A. Factor 1: The Highly Sensitive Nature of the Allegations Warrants**  
**Anonymity**

7 Under the first Sealed Plaintiff factor, courts evaluate whether the case involves matters  
 8 that are highly sensitive and personal in nature. Allegations of sexual assault fall squarely within  
 9 this category. Sexual violence has long been recognized as “a paradigmatic example of highly  
 10 sensitive and personal claims and thus favor a plaintiff's use of a pseudonym.” See Anonymous v.  
 11 Anonymous, No. 24-CV-3495 (JHR) (RFT), 2024 U.S. Dist. LEXIS 88282, \*8, (S.D.N.Y. May  
 12 13, 2024) (citation omitted), attached hereto as Exhibit E. While federal courts have historically  
 13 granted pseudonym status in cases involving abortion, sexual orientation, and mental health,<sup>3</sup> this  
 14 Court has been especially protective in sexual assault matters. See Doe v Combs, 2024 U.S. Dist.  
 15 LEXIS 213256, \*3 (“The Court concludes that factor[] one... weigh in [plaintiff's] favor.  
 16 Regarding the first factor, this case entails highly sensitive and personal matters involving  
 17 allegations of sexual abuse.”). These protections are even more crucial when the alleged abuse was  
 18 perpetrated by individuals with substantial public platforms, media access, and power—factors that  
 19 are acutely present here. Id.

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 25 <sup>3</sup> See EW v. New York Blood Ctr., 213 F.R.D. 108, 111 (“A number of decisions have pointed to cases involving  
 26 abortions and abortion rights as the paradigmatic example of the type of highly sensitive and personal matter that  
 27 warrants a grant of anonymity. See, e.g., Roe v. Aware Woman Center for Choice, Inc., 253 F.3d 678, 685 (11th Cir.  
 28 2001) cert. denied, 534 U.S. 1129, 151 L. Ed. 2d 970, 122 S. Ct. 1067 (2002); Southern Methodist Univ. Ass'n v.  
Wynne & Jaffe, 599 F.2d 707, 712-13 (5th Cir.1979); Rankin v. New York Pub. Library, 1999 U.S. Dist. LEXIS  
 18565, 1999 WL 1084224, at \*1 (S.D.N.Y. December 2, 1999); W.G.A. v. Priority Pharmacy, Inc., 184 F.R.D. 616,  
 617 (E.D.Mo.1999); Doe v. Rostker, 89 F.R.D. at 161; see also Doe v. Commonwealth's Atty for Richmond, 403 F.  
 Supp. 1199 (E.D.Va. 1975)(homosexuality), aff'd, 425 U.S. 901, 47 L. Ed. 2d 751, 96 S. Ct. 1489 (1976).; Doe v.  
McConn, 489 F. Supp. 76 (S.D.Tex. 1980) (transsexuality)”).

1 This litigation centers on profound traumatic allegations of sexual violence perpetrated by  
2 powerful, well-known figures. Plaintiff alleges that she was vaginally and orally raped after being  
3 given a drink she believes was surreptitiously laced with an intoxicant, leaving her unable to  
4 consent. The three Defendants—wealthy and influential individuals—have carefully cultivated a  
5 high-profile public persona and maintain considerable reach in media and business spheres. See  
6 Exhibit C. The deeply intimate and traumatic nature of these allegations—coupled with the  
7 significant media attention surrounding the case—makes the risk of psychological harm from  
8 public exposure both substantial and immediate. See Exhibit B. Indeed, the risk of further harm to  
9 Plaintiff is not speculative; it is substantial and well-supported by her sworn affidavit. Id.; see also  
10 E.W., 213 F.R.D. at 112–13 (noting that modern online access to court records intensifies the  
11 psychological toll and risk of re-traumatization and emotional injury, often “far greater than could  
12 be inflicted by mere bodily harm.”). Most critically, Plaintiff has attested that if anonymity is  
13 denied, she may not be able to proceed with the lawsuit at all. See Exhibit B. Under these  
14 circumstances, the compelling interest in protecting the privacy and psychological safety of a  
15 sexual assault survivor far outweighs any abstract interest in disclosing her identity. This first  
16 factor, therefore, weighs decisively in favor of anonymity.

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20 **B. Factor 2: Risk of Retaliatory Harm or Harassment Supports**  
21 **Anonymity**

22 The second factor from Sealed Plaintiff requires courts to consider whether identification  
23 poses a risk of retaliatory physical or mental harm to the plaintiff or innocent non-parties. This  
24 consideration is particularly significant in cases involving sexual violence, high-profile defendants,  
25 or matters of public controversy. As courts have recognized, “[t]he nature of the allegations makes  
26 it logical to conclude at this early stage that disclosure of Plaintiff’s identity would cause further  
27 psychological harm to Plaintiff, which is the precise harm this litigation seeks, in part, to redress.”  
28 Doe v. Combs, 2024 U.S. Dist. LEXIS 213256, at 4; see also E.W., 213 F.R.D. at 111 (finding

1 anonymity warranted where disclosure would subject the plaintiff to “public disapproval,  
2 harassment, or bodily harm”).

3       Here, Plaintiff has brought profoundly sensitive allegations of sexual assault against three  
4 widely recognized individuals with powerful reputations, substantial financial resources, and an  
5 expansive public presence. Defendants Alon and Oren Alexander, along with their brother Tal  
6 Alexander, are prominent figures whose notoriety significantly amplifies the risk that revealing  
7 Plaintiff’s identity would provoke intense media coverage, public scrutiny, and harassment. This  
8 risk is not speculative—it is grounded in the realities of litigating against wealthy, influential  
9 individuals in high-profile matters involving sexual violence and gender-based abuse and supported  
10 by the record. See Exhibits B, D. Importantly, Plaintiff has already taken deliberate and proactive  
11 steps to maintain her anonymity, including offering to disclose her identity to Defendants’ counsel  
12 only if they sign a protective agreement ensuring confidentiality. Her request reflects genuine  
13 fear—not only of re-traumatization—but of retaliation, humiliation, and lasting damage to her  
14 mental health and personal life. Indeed, her sworn declaration explicitly affirms that public  
15 identification would cause her profound emotional distress, trauma, and revictimization. See  
16 Exhibit B. She further explains that disclosure could expose her to ridicule, professional and  
17 reputational harm, retaliation, and embarrassment from her family, employer, and community. Id.  
18 Most critically, Plaintiff attests that if her identity were made public, she might feel compelled to  
19 reconsider pursuing this litigation at all—underscoring the gravity of the threat posed by public  
20 exposure. Id.

21       This case, like Doe v. New York Univ., presents a substantial risk that public identification  
22 would expose the Plaintiff to retaliatory harm. 537 F. Supp. 3d at 496–97. There, the court found  
23 no justification for subjecting the plaintiff to “potential online retaliation,” given the nature of the  
24 allegations and the plaintiff’s particular vulnerabilities. Id. The same rationale applies here.

1 Plaintiff has alleged brutal sexual violence by powerful, high-profile individuals—Defendants with  
2 significant financial resources, public platforms, and media access. See Exhibit C. Given this  
3 extreme imbalance of power and the intense public scrutiny surrounding the case, public  
4 identification poses not just a risk of emotional harm, but a real threat of harassment, intimidation,  
5 and further trauma. Accordingly, the equities—particularly under this second Sealed Plaintiff  
6 factor—strongly support anonymity.

8 **C. Factors 3 and 4: Plaintiff Faces Significant Psychological Harm and is**  
9 **Particularly Vulnerable to the Consequences of Public Disclosure,**  
10 **Both Factors of which Support Anonymity**

11 The third and fourth Sealed Plaintiff factors focus on whether public disclosure would cause  
12 psychological or emotional harm beyond mere embarrassment, and whether the plaintiff is  
13 particularly vulnerable to such harm. Here, both factors strongly support Plaintiff's request to  
14 proceed anonymously. Plaintiff has alleged deeply personal and traumatic sexual assaults by high-  
15 profile Defendants, and her Complaint and sworn affidavit detail the severe, ongoing psychological  
16 effects of those sexually violative assaults—effects that would be significantly exacerbated by  
17 public identification. See Exhibits B, D. These include persistent anxiety, flashbacks, sleep  
18 disturbances, and panic attacks, all of which are intensified by the fear of exposure. Id. Critically,  
19 Plaintiff does not seek anonymity to avoid reputational discomfort or social stigma alone. Her  
20 sworn declaration confirms that public exposure would cause her profound emotional distress and  
21 re-victimization—and could even prevent her from continuing with the litigation. See Exhibit B;  
22 see also Anonymous, 2024 U.S. Dist. LEXIS 88282, at \*4, (recognizing that pseudonym protection  
23 is warranted when disclosure presents a risk of psychological harm beyond embarrassment).

24 This litigation also arises in the context of a significant power imbalance. The Defendants  
25 are wealthy, high-profile public figures with deep ties to the media, real estate, and security  
26 industries. Plaintiff, by contrast, is a private individual whose personal and professional life could  
27  
28

1 be permanently altered if she were forced to litigate under her legal name. See Exhibits B, D. Her  
2 vulnerability is not speculative—it is rooted in her lived experience and supported by the record.  
3 Id. While she is not in a mental health facility or undergoing court-mandated care, her sworn  
4 testimony confirms she is particularly susceptible to the psychological toll that public disclosure  
5 would trigger. Id. That is precisely the type of harm these factors are designed to prevent.  
6 Accordingly, both the third and fourth Sealed Plaintiff factors weigh heavily in favor of granting  
7 anonymity.  
8

9 **D. Factor 6: The Defendants Would Not Be Prejudiced by Allowing the**  
10 **Plaintiff to Pursue Her Claims Anonymously**

11 The sixth Sealed Plaintiff factor balances whether allowing a plaintiff to proceed  
12 anonymously would cause unfair prejudice to the defendant. In this case, there is no such prejudice.  
13 Plaintiff filed her request for anonymity at the outset of the case, and Plaintiff has made clear from  
14 the beginning that she is fully prepared to disclose her identity to Defendants—so long as  
15 appropriate protective measures are in place. See Doe v. Combs, 2024 U.S. Dist. LEXIS 213256,  
16 at \*4 (“There is no apparent prejudice to Defendants from Plaintiff proceeding anonymously at this  
17 early stage of the litigation.”). Indeed, Plaintiff’s willingness to identify herself through the proper  
18 legal channels underscores that this request is not an effort to conceal or delay—it is simply about  
19 safeguarding her identity from public exposure while preserving fairness for all parties.  
20

21 While Defendants cannot credibly argue that they would be prejudiced by Plaintiff  
22 proceeding anonymously, should they raise such an argument, any potential prejudice would be  
23 significantly diminished by the fact that they are already facing federal criminal charges based on  
24 the substantially similar misconduct at issue in this case. To the extent Defendants suggest that  
25 public identification is necessary to safeguard their rights, such a concern is misplaced in this civil  
26 context. Plaintiff has already agreed to disclose her identity to defense counsel under a narrowly  
27 tailored confidentiality agreement, thereby ensuring Defendants can prepare and mount a full and  
28



1 fair defense. The procedural safeguards available in this matter are more than sufficient to protect  
2 Defendants' interests, and public disclosure of Plaintiff's identity adds no meaningful legal value  
3 and imposes no barrier to their ability to investigate, respond, or litigate effectively. As Plaintiff  
4 has taken every reasonable step to ensure that Defendants can defend themselves while protecting  
5 her from unnecessary public exposure. There is no risk of prejudice, and this factor weighs  
6 decisively in favor of granting anonymity.  
7

8 **E. Factor 7: Plaintiff Has Not Publicly Disclosed Her Identity and Has**  
9 **Taken Affirmative Steps to Preserve Her Anonymity**

10 The seventh Sealed Plaintiff factor considers whether the plaintiff has made her identity  
11 public in connection with the events underlying the litigation. Courts have consistently found this  
12 factor weighs in favor of anonymity where the plaintiff has refrained from publicizing her  
13 identity and has taken proactive measures to protect her privacy. See Doe v. Colgate Univ., No.  
14 5:15-CV-1069, 2016 U.S. Dist. LEXIS 48787, at \*2 (N.D.N.Y. Apr. 12, 2016) (finding this factor  
15 supported anonymity where the plaintiff had "not publicized the lawsuit or sought media  
16 attention"), attached hereto as Exhibit F; see also Doe v. Combs, 2024 U.S. Dist. LEXIS 213256,  
17 at \*5.  
18

19 Here, Plaintiff has never spoken publicly about the horrific sexually violent assault she  
20 suffered through, or her involvement in this matter. Other than limited disclosures to a few  
21 trusted individuals for emotional support and law enforcement, Plaintiff has not identified herself  
22 as a victim or survivor, discussed the allegations on social media, or participated in any public  
23 statements or interviews. Plaintiff also has never made her identity public in connection with this  
24 lawsuit. Her consistent efforts to maintain privacy reflect a clear intent to avoid publicity and  
25 protect her mental and emotional well-being.  
26

27 Moreover, Plaintiff's counsel has taken affirmative and immediate steps to protect  
28 Plaintiff's identity. Upon filing Plaintiff's Complaint, Plaintiff's counsel promptly created and

1 sent all counsel for Defendants a protective order. Further, counsel has consistently referred to  
2 Plaintiff as “Jane Doe 1” in all public filings. Plaintiff’s affirmative steps to protect her identity  
3 and dignity in light of the sensitive nature of this litigation weigh in favor of anonymity and  
4 demonstrate the sincerity and legitimacy of her request for pseudonym status. Accordingly, the  
5 seventh factor weighs strongly in favor of anonymity.  
6

7 **F. Factor 8: Anonymity Will Not Undermine the Public’s Interest in the**  
8 **Proceedings**

9 The eighth Scaled Plaintiff factor considers whether permitting a party to proceed  
10 anonymously will prejudice the public’s interest in open judicial proceedings. Courts have  
11 consistently held that anonymity does not obstruct the public’s ability to follow or understand the  
12 legal and factual issues at stake. As the Fifth Circuit observed in Doe v. Stegall, “party anonymity  
13 does not obstruct the public’s view of the issues joined or the court’s performance in resolving  
14 them,” and “the assurance of fairness preserved by public presence at a trial is not lost when one  
15 party’s cause is pursued under a fictitious name.” 653 F.2d at 185. Similarly, in E.W., 213 F.R.D.  
16 at 113, the court found that the privacy rights of a plaintiff who brought suit after receiving a tainted  
17 blood transfusion outweighed any First Amendment interest in disclosure of her name. The court  
18 emphasized that “the facts of this case provide no occasion for imposing such an invasion of privacy  
19 as the price for litigating a legitimate private complaint.” Id.  
20

21 The same reasoning applies here. Plaintiff is pursuing serious and credible allegations of  
22 sexual assault against three private individuals. The public’s interest in ensuring accountability  
23 for sexual violence—particularly where the defendants are high-profile figures—can be fully  
24 served through the adversarial process, judicial scrutiny, and public access to the court’s rulings.  
25 Plaintiff’s identity is not necessary for the public to understand the claims, evaluate the evidence,  
26 or assess the fairness of the proceedings. Indeed, the harm to the public interest would be far  
27 greater if Plaintiff is forced to abandon her claims due to the threat of public exposure. In her  
28



1 sworn affidavit, Plaintiff stated that if anonymity is not granted, she may reconsider whether she  
2 can continue with this litigation at all. See Exhibit B. Denying anonymity in such circumstances  
3 would not promote transparency—it would chill the pursuit of justice and deter survivors from  
4 coming forward. Accordingly, this factor also weighs strongly in favor of allowing Plaintiff to  
5 proceed under a pseudonym.  
6

7 **G. Factor 9: Allowing Plaintiff to Proceed Anonymously Furtheres the**  
8 **Public Interest**

9 The ninth Sealed Plaintiff factor weighs whether the plaintiff's request is driven by  
10 improper motives or whether there is a legitimate public interest in disclosure. Here, both  
11 considerations strongly support anonymity. Plaintiff seeks to proceed under a pseudonym not for  
12 strategic gain or to avoid accountability, but to protect her mental health, safety, and dignity in the  
13 face of deeply traumatic allegations. See Exhibits B, D. Her request is supported by a sworn  
14 affidavit detailing the emotional harm and re-traumatization she would suffer if forced to reveal  
15 her identity. See Exhibit B. Further, she, through counsel, has already demonstrated her willingness  
16 to disclose her identity to Defendants under appropriate protective measures -- demonstrating  
17 transparency, cooperation, and a clear commitment to fairness. This is the hallmark of good faith.  
18

19 Furthermore, the public has no meaningful interest in knowing Plaintiff's name. While the  
20 facts here are deeply personal and disturbing, the legal questions this case presents—relating to  
21 sexual assault, consent, civil accountability, and the rights of survivors—are legal in nature and do  
22 not turn on Plaintiff's identity. Requiring Plaintiff to reveal her name would do nothing to enhance  
23 public understanding or oversight of these proceedings. Anonymous, 2024 U.S. Dist. LEXIS 88282  
24 at \*10 (“The ninth factor teaches that if the issues presented by a case are “purely legal in nature,”  
25 the “public interest in knowing the litigants’ identities” is “atypically weak... Petitioner’s case  
26 appears to hinge on questions of statutory construction regarding access to medical records —  
27 purely legal issues — and so the public’s interest in the litigation would not be furthered by  
28

1 requiring disclosure of Petitioner's identity.") Courts have made clear that the administration of  
2 justice remains fully transparent even when a survivor proceeds anonymously. Doe v. Stegall, 653  
3 F.2d at 185. Granting anonymity here not only protects this Plaintiff—it sends a powerful message  
4 that survivors can pursue justice without sacrificing their privacy or well-being. Accordingly, this  
5 ninth factor, like the others, weighs decisively in favor of allowing Plaintiff to proceed under a  
6 pseudonym.  
7

8 **H. Factor 10: No Adequate Alternative to Anonymity Exists to Protect**  
9 **Plaintiff's Safety and Privacy**

10 The final Sealed Plaintiff factor considers whether there are any alternative mechanisms that  
11 could adequately protect a plaintiff's confidentiality short of allowing the plaintiff to proceed under  
12 a pseudonym. Courts generally weigh this factor in favor of anonymity when disclosure of the  
13 plaintiff's identity cannot be meaningfully limited through other procedural safeguards. See Doe v.  
14 Combs, 2024 U.S. Dist. LEXIS 213256, \*4 ("Finally, with respect to the tenth factor, the Court is  
15 unaware of any alternative mechanisms to protect Plaintiff's identity.")  
16

17 Here, no viable alternative exists that would sufficiently protect Plaintiff's identity while  
18 still enabling her to pursue her claims. As noted in her affidavit, public disclosure would not only  
19 expose her to irreparable psychological harm and re-traumatization but could also deter her from  
20 continuing with this litigation altogether. See Exhibit B. Measures such as sealing limited documents  
21 or restricting public access to certain filings would be insufficient to prevent the widespread  
22 dissemination of her identity in an age where public court records are readily searchable online.  
23 Once disclosed, the harm is irreversible.  
24

25 Plaintiff has already taken affirmative steps to safeguard confidentiality without disrupting  
26 Defendants' ability to defend the case. Counsel has offered to disclose Plaintiff's identity to each  
27 Defendant's counsel under the protection of a proposed confidentiality order pending any ruling on  
28 anonymity. These efforts reflect a measured, good faith attempt to balance the interests of due


1 process with the need to avoid unnecessary public exposure. But without leave to proceed  
2 anonymously, those protective steps would be nullified. Thus, because there is no practical or  
3 effective alternative that would mitigate the risk of harm to Plaintiff while preserving her ability to  
4 litigate this case, this final factor weighs strongly in favor of anonymity.

6 **CONCLUSION**

7 For the reasons stated herein, the Plaintiff respectfully requests that this Honorable Court  
8 grant Plaintiff's Motion for Leave to Proceed Anonymously in its entirety.

9 Dated: March 28, 2025

11 **RESPECTFULLY SUBMITTED:**

12 

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